



Questions and Answers
from the Native Asset Building Initiative (NABI) Webinars
 May 23 and 30, 2013
Administration for Native Americans (ANA) and
Assets for Independence (AFI) Program

Contents

Program Design Questions 1
 Funding Opportunity Announcement and Eligibility Questions 2
 Financial Institution Partner Questions 4

Program Design Questions

1. Can this project target Pacific Islanders, e.g. Samoans from American Samoa?

Yes, projects targeting Pacific Islanders are eligible to apply. The applying organization must be a 501(c)3 nonprofit or one of the other types of eligible entities listed in the Funding Opportunity Announcement.

2. What is the required amount of education hours?

For the AFI portion of this NABI grant, there are no minimum or maximum requirements in terms of the education. It’s what you state in your program guidelines as to what the requirements are and we just ask that whatever you state in your guidelines that you adhere to and that you’re consistent across the board.

3. How does anyone with an IDA program handle those individuals that are just over the income guidelines? We have multiple students that want to enroll in our IDA but income guidelines are preventing that when some are just barely over the limit and those that are under just refuse to get involved. I asked this after hearing about Four Bands and their flexibility.

(Grantee response) Truthfully, everybody has this issue with the income guidelines. We have encouraged clients to speak with the person who’s helping them file taxes to see if there was a way that it was misrepresented and a few of them have come back the next year with a different income tax and a different income.

So that has been one of the things that we’ve been able to do but it doesn’t happen very often. I guess mainly then I’d say the question becomes how to engage those participants that aren’t normally being engaged.

4. In regard to post-secondary education - do participants need to attend or enroll in a university or community college, or can the IDAs be used for a trade school or certification program?

Yes, the IDAs can be used for a trade school or certification program, as long as it is an eligible educational institution.

5. The participants' contribution to the IDA has to be earned income; are there any exceptions to this rule? Can we access Crown Funding to encourage family giving?

There are no exceptions to this rule. Participants can have unearned income (i.e., SSI or TANF) as well, but they need to have at least enough earned income to cover their expected monthly IDA savings. As for family contributions, IDA deposits must come from the individual saver's own earned income, not that of family members. Others can support an IDA participant in that gifts from family members can allow savers to reallocate earned income from one expense category in their budget to saving in their IDA account.

There are other Federal programs that provide earned income to their participants that can be leveraged. The Federal Work Study Program, the Corporation for National and Community Services AmeriCorps program, Workforce Investment Act programs, and other Federal employment and training programs all provided earned income to participants that can be saved in IDAs.

6. What type of job placement services can be offered to IDA participants?

There is no restriction on what types of job placement services can be offered to IDA participants; in fact, helping IDA participants advance their careers and increase their income after enrollment is encouraged as it can help them advance towards their asset purchase goal more quickly.

The costs for job placement services such as a headhunter, enrollment to a fee based web service, or a job placement specialist is an allowable use of funds in the ANA budget, so SEDS funds can be used to cover these costs.

Funding Opportunity Announcement and Eligibility Questions

7. Will the CFDA number for NABI be 93.612, and if so, can somebody apply then for the current SEDS and the upcoming SEDS?

Yes. You can apply for both although they all have the same CFDA number. You are eligible to apply if you don't currently have an award with that CFDA number. The caveat is you will not receive an award if you're within the funding range for all three of those programs. You would only receive one award.

8. If you currently have a SEDS grant for another program not financial based, could you still apply for this grant since the funds are not completely SEDS funds?

You cannot have a NABI grant while you have a current SEDS grant. If your project is ending this year, you may be funded for a new SEDS project since they will not be held simultaneously.

9. How long will applicants have to submit the application after FOA is dropped?

Applicants will have 45 days to submit applications.

10. We have applied for the CDFI planning grant. I was wondering if maybe we should wait until we do that before that we make the attempt for the NABI?

We don't make those decisions we just ensure that you're eligible to apply, then it's up to the review panel to read your application and make a recommendation to us as to whether or not they feel you presented a good plan and met the FOA criteria.

11. What is the minimum match amount for non-Federal funds just to apply for the grant program?

For the application consideration, you would have to have a firm commitment in the application. The amount that you apply for would be the amount that you need to match. The minimum in the FOA states \$50,000 but AFI has funded grants as small as \$12,500. So it's a matter of making sure that the commitment letter is in the application.

There's actually a second part to that. Being that this is a jointly-funded program, it's two separate budgets if you read the funding opportunity announcement so there's two separate matches. There's the match for the IDA accounts for the AFI side and then ANA's dollars which is a max of \$250,000 per budget year per five years.

You need to have a 20% match on that as well so that doesn't have to be a hard cash match. It can be in-kind contributions and when the funding opportunity announcement comes out, it will detail, you know, what kind of things are allowable but yes, it doesn't have to be a hard cash match.

But you do basically you take the Federal amount and you multiply it by 25% and that will give you 20% of the entire budget, Federal amount, Federal together.

12. Is there any way around the tribal 501(c)(3) non-profit partnership requirement? We have several non-profits that serve the tribe but none of them are 501(c)(3)s.

The FOA clearly states that in order to apply, you would have to partner with or be a native 501(c)(3) and if you read into that, there's criteria as to what the native 501(c)(3) is and mainly it's that 50% of the board are from the surrounding community. So if you take a look at that criteria, it cannot be overlooked so you may want to look into in the future establishing a 501(c)(3).

The AFI legislation is pretty specific on their eligible entities and in order for us to maintain the joint funding, ANA has to comply with AFI eligibility requirements, but at the same time, they could narrow the funding down to this specific target community of native communities instead of a larger pool.

13. When is the expected FOA scheduled to be posted and will we have the typical 60 days to respond or if you do know when that due date would be?

The FOA is currently in the review and approval process internally here at ACF which we're hoping it will be released in the next couple of weeks. The best date we can give you is what's on the HHS grants forecast right now which is next week. We're anticipating a 45-day response time.

(NB: The 2013 FOA was released on May 31, 2013 and can be accessed at <http://www.grants.gov/search/search.do;jsessionid=pFFBRy9Hw2hG788jTD0nC8SvpzyM2TFFx3JX92pyvQ6bDm3jIVJb!-2116821137?opId=235734&mode=VIEW>)

14. If we have TANF program, can we apply for NABI?

Yes. Also, if you have a tribal TANF program, you can also use tribal TANF funds to also do an IDA program too so there's lot of options there.

15. When using 638 funds, does the tribe have to designate and mark these funds as IDA match when the tribe submits annual budgets to the BIA?

A commitment for non-Federal match for the AFI portion of the NABI application is required, therefore designation would be needed. Non-Federal match funds are required to be deposited prior to drawing down AFI IDA funds. Your Federal BIA program specialist and grants officer will be able to guide you to their grant requirements, please contact them directly.

16. To start or get IDA funding for our area, can we use donations from the Navajo Housing Authority to be used as matching funds with NABI? Or do we look for funding in our area, like from banks/credit unions?

The Navajo Housing Authority could be a funding partner for your NABI project. Banks and credit unions are also common sources of funding for IDA projects. Assistance on raising match for IDA programs can be found on the AFI Resource Center website www.IDAresources.org by clicking on the “Fundraising” square.

With the housing authority and other public agencies, it’s important to ascertain if the funds they contribute are Federal in origin or from private, local, state, or tribal sources. There are limited exceptions to the “non-Federal” cash contribution requirement for AFI funding, common examples are 638 funds and NAHASDA funds. The legislation for the source of Federal funds would indicate whether or not the funds can be used as match.

Financial Institution Partner Questions

17. Is there a minimum/maximum amount of financial institutions we are allowed to partner with?

No, there is not. You can partner with as many as are available to help you with the program.

18. Does NABI operate like a bank? And, do you think that banks will view NABI as competitors?

All NABI programs work with banks. The deposits that people save go into commercial banks for the most part so it’s actually a lot of partnerships with banks to get some parts of the population that might be unbanked and they’ll view this to start using banks and taking advantage of those resources.

The NABI and AFI program both partner with financial institutions. Some of our grantees happen to be credit unions but I don’t believe that the banks view any of the IDA programs as competitors. They view them as the potential for future clients. Those persons who are coming to the program and learning how to save will eventually purchase assets and larger assets hopefully and so the bank views it as actually a partnership for future customers.

19. Are grantees required to partner with a bank? Do we have to hold "trust" accounts?

All grantees will need to have a financial institution partner, unless they themselves are financial institutions eligible to apply for NABI funds (CDFIs or credit unions, as per the FOA). The financial institution partners will hold the individual savers’ IDA accounts and the Project Reserve Account where the matching funds are held until savers are ready to make an asset purchase.

The IDA accounts should be set up as “custodial” accounts jointly owned by the grantee and the individual saver, where neither party can withdraw money without the other’s permission.